

In the Matter of:

ESTATE OF PATRICK HARMON, SR., et al.

VS

SALT LAKE CITY CORPORATION, et al.

PATRICK HARMON II

November 08, 2022

RED ROCK REPORTING

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SALT LAKE CITY, UT 84110
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IN THE UNITED STATES DISTRICT COURT
STATE OF UTAH, CENTRAL DIVISION

ESTATE OF PATRICK HARMON)	
SR.; PATRICK HARMON II, as)	
Personal Representative of)	
the Estate of Patrick)	
Harmon Sr., and heir of)	Case No.
Patrick Harmon Sr., TASHA)	2:19-cv-00553-HCN-CMR
SMITH, as heir of Patrick)	
Harmon, Sr.,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
SALT LAKE CITY, a)	
municipality; and OFFICER)	
CLINTON FOX, in his)	
individual capacity,)	
)	
Defendants.)	

REMOTE ZOOM DEPOSITION OF: PATRICK HARMON, II

NOVEMBER 8, 2022

9:00 A.M.

Witness Location:
4513 Twinbrook Road
Fairfax, Virginia

Reporter: Vickie Larsen, CCR/RMR
Utah License No. 109887-7801
Nevada License No. 966
Notary Public in and for the State of Utah

1 APPEARANCES

2 (All parties were present by Zoom)

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I N D E X

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1 November 8, 2022 9:00 a.m.

2 P R O C E E D I N G S

3

4 PATRICK HARMON, II,
5 called as a witness, having been duly sworn, was
6 examined and testified as follows:

7

8 EXAMINATION

9 BY MS. NICHOLS:

10 Q. Thank you very much. Mr. Harmon, thank
11 you for being here today. My name is Katie Nichols.
12 I represent the defendants in this case.

13 What is your full name?

14 A. Patrick Harmon The Second.

15 Q. Do you have a middle name?

16 A. No.

17 Q. I have a number of questions for you
18 related to this case. I recognize some of these
19 topics might be painful, and it's not my intention to
20 cause you distress.

21 If at any point you need a break, we can
22 definitely do that. I would just ask that you finish
23 answering any question that's pending, and then after
24 that we can take a break.

25 Does that make sense?

1 A. Yes.

2 Q. Where do you currently live?

3 A. Fairfax, Virginia.

4 Q. And who do you live with?

5 A. I live with two other roommates in a
6 house in a very nice neighborhood.

7 Q. How long have you lived there?

8 A. I've been here for over a year and a
9 half, currently.

10 Q. Where did you live prior to that
11 location?

12 A. I lived down the street in Springfield,
13 Virginia. At the time I was with my partner who I
14 have a child with.

15 Q. What is your date of birth?

16 A. 11-14-88.

17 Q. Do you currently have a spouse or
18 partner?

19 A. No.

20 Q. And I think you mentioned one child. Do
21 you have any other children or just the one?

22 A. Just the one.

23 Q. How old is that child?

24 A. Four.

25 Q. Have you ever been involved in a lawsuit

1 or court case before?

2 A. No.

3 Q. Have you ever been deposed before?

4 A. No.

5 Q. I have a number of questions for you
6 about Patrick Harmon Senior, obviously you can only
7 answer what you know. So if there's information that
8 you don't know, feel free to say that you just don't
9 know, that's perfectly fine.

10 Was Patrick Harmon Senior your biological
11 father?

12 A. Yes.

13 Q. What is the name of your mother?

14 A. Carmen Evans.

15 Q. Sorry, can you say that again.

16 A. Carmen Evans.

17 Q. Evans, okay.

18 Were your mother and father married?

19 A. No.

20 Q. Do you know in what years they were in a
21 relationship together?

22 A. I believe '87 to '88, '89. So between
23 '87 to '89.

24 Q. Do you know if they ever lived together?

25 A. What I do know of, briefly, yes.

1 Q. Is your mother still living?

2 A. Yes.

3 Q. Do you know if she was in contact with
4 Mr. Harmon in the years prior to his death?

5 A. I do not.

6 Q. Where was Mr. Harmon born?

7 A. I believe he was born in St. Louis,
8 Missouri.

9 Q. And where did he live growing up?

10 A. I believe in St. Louis, Missouri.

11 Q. How many siblings did he have?

12 A. I can't remember the exact number, but I
13 think it's four.

14 Q. Do you know any of their names?

15 A. Chris -- Christopher Harmon, Hellen --
16 Hellen Harmon, Roy Harmon. And then I can't remember
17 the last one because I know he passed away, so -- but
18 I don't remember his first name.

19 Q. That was going to be my next question.
20 Are they all living? You said one had passed away?

21 A. I think one had passed away and one had a
22 major medical issue, so I think his abilities are
23 limited.

24 Q. Where did you grow up?

25 A. I grew up between -- in Aurora, Colorado.

1 Denver, Colorado, pretty much.

2 Q. So you lived either in Denver or Aurora,
3 Colorado, for the entire time until you turned 18?

4 A. Correct.

5 Q. Okay. Did you, during that time period
6 until you turned 18, live in the same house as
7 Mr. Harmon?

8 A. Probably when I was -- right when I was
9 first born, I think, that was the only time I can
10 remember in that period when they lived together.
11 Beyond that, no.

12 Q. So after around 1989 you didn't live with
13 him; is that correct?

14 A. Yes.

15 Q. But do you know where he lived after
16 that? Did he stay in the greater Denver area?

17 A. I don't believe so, because I remember
18 making phone calls when I was around five with him in
19 St. Louis.

20 Q. From the time you were born until 18, who
21 else did you live with?

22 A. Just my mother, and then for a year I
23 lived with my aunt, but that's my mom's sister.

24 Q. Do you have a sister?

25 A. Through the same father, yes.

1 Q. And that's Tasha Smith?

2 A. Yes.

3 Q. But you have different mothers?

4 A. Correct.

5 Q. Do you know when Tasha was born?

6 A. I believe -- where or when?

7 Q. When.

8 A. I believe she -- she's three years
9 younger than me and her birthday is January 28th, so I
10 think that's '91.

11 Q. Did you ever live with Ms. Smith?

12 A. No.

13 Q. How would you describe your relationship
14 with your father while you were growing up?

15 A. Limited, just because of him not being
16 around physically. There was periods where we talked
17 on the phone, but partially had to do with --

18 THE REPORTER: I didn't hear the last
19 part, I'm sorry.

20 THE WITNESS: Due to it was him being in
21 and out of prison for a big chunk of that part of my
22 life.

23 Q. BY MS. NICHOLS: How would you describe
24 your relationship with him once you became an adult?

25 A. There was -- it was better than I

1 expected, to be quite frank with you, because there
2 was a lot of things I was timid on because I didn't,
3 obviously, have resentment from him not being around.

4 But at the same time, he was my father.
5 And so I -- there was a big chunk of me that I didn't
6 really -- I felt like was blank on my dad's side, and
7 so when I finally got to a relationship it fulfilled a
8 lot of holes and blank spots that I had.

9 Q. When you said -- I think you said
10 something about when you got to the point of having a
11 relationship. Approximately when did that occur?

12 A. I was 22 when we finally were able to
13 reconnect.

14 Q. And what did that -- what did that
15 reconnection look like?

16 A. It was through me reaching or me being in
17 contact -- well, my uncle, which is Christopher
18 Harmon, my dad's brother, sent me a friend request on
19 Facebook at this time.

20 I think this was around when Facebook
21 really started to blow up with people being able to
22 find lost loved ones and friends.

23 And so then when that happened, I
24 received a friend request and it threw me off because
25 it was the first time I seen another Harmon.

1 And then so I asked my mom if my dad had
2 any siblings named Christopher Harmon, and she said,
3 Yeah, that's your dad's brother.

4 And so then from there I was able to
5 reach out with him and then get his -- my dad's number
6 from my uncle, and then that's when I called him.

7 Q. What was Mr. Harmon's reaction when you
8 called him?

9 A. Overjoyed. A lot of excitement,
10 disbelief. I mean, he kind of anticipated me calling,
11 but I don't -- I don't think -- you know, you hearing
12 your son's talking to you for the first time after not
13 really seeing him since he was a kid or a baby, like,
14 I could just see the excitement in his voice and the
15 love that he had. He just couldn't -- couldn't stop
16 telling me how much he loved me.

17 Q. Do you know where he was living at that
18 time when you first called him?

19 A. I believe he was somewhere in Utah. I
20 don't remember the exact city, but I think he was in
21 Utah.

22 Q. Were you still in Colorado at this time?

23 A. Yes, I was living in Denver.

24 Q. After you reconnected with him, how often
25 would you speak with him on the phone?

1 A. We spoke at least once a week. I mean,
2 in that first week when we first connected we talked
3 about four or five times every, like, in a row each
4 day.

5 But then it went to, like, once a week
6 for a period of time, and then there was a period
7 where I didn't hear from him.

8 Q. After you reconnected with him, did you
9 ever see him or meet him in person?

10 A. No. There was many plans to try and make
11 something like that happen, but I don't -- between my
12 dad's situation, I don't think he was really -- he
13 wasn't in a position to try and travel.

14 I don't know if that had anything to do
15 with his -- if he was on probation or anything like
16 that, but that's something we didn't -- we never got
17 into.

18 Q. And I think you mentioned Mr. Harmon did
19 serve time in jail or prison; is that right?

20 A. Correct.

21 Q. Do you know if he served in jail or
22 prison on more than one occasion?

23 A. I don't know exactly, but my guess is
24 yes.

25 Q. Do you know for how long he served time?

1 A. Not the exact amount, no, but it was for
2 a big chunk of my life.

3 Q. Do you know if he spent any time in
4 prison after you had reconnected?

5 A. No, I do not.

6 Q. You don't know or he did not?

7 A. Oh, I don't know if he did.

8 Q. Do you know where Mr. Harmon was in
9 prison?

10 A. I mean, when -- right before he got out
11 before we reconnected, when I looked his name up he
12 was in Canyon City, Colorado, which was the first time
13 I heard of that city or knowing there was a prison
14 there, so -- but outside of that moment, I never knew
15 exactly where he was.

16 Q. Did you ever visit him in prison?

17 A. No.

18 Q. And maybe just to clarify for myself, you
19 had never seen Mr. Harmon in person since you were a
20 baby; is that correct?

21 A. Correct.

22 Q. Okay. In the complaint it states
23 "Mr. Harmon did not live a perfect life."

24 What did that mean?

25 A. The things that I had heard of just the

1 troubles he grew up with in St. Louis, being a product
2 of his environment. So a lot of light crime things,
3 doing things pertaining to crime. I don't exactly
4 know what, but I know there was obviously instances
5 for him to be in and out of prison for the things that
6 he was doing.

7 So, I mean, obviously he wasn't perfect.
8 He wasn't doing obviously the right things, but he was
9 still a loving man from what I know of him and what
10 everybody else spoke of him.

11 Q. The complaint also states that "Prior to
12 his death he had found renewed spirituality."

13 What does that mean?

14 A. He was going to church more, from my
15 understanding, being more of a man of God, trying to
16 change his life back from where he had started.

17 And that was also some of the things that
18 he had spoken with me about with just how he didn't
19 make the right decisions in life and he didn't have
20 the best upbringing, but that he was also happy that I
21 turned out to be nothing like him.

22 Q. Do you know at what point he had found or
23 was focusing on spirituality?

24 A. He was speaking about it when I had
25 spoken with him for the first time. Within that week

1 of just him trying to find God, be a better man.

2 Q. Do you know if he also reconnected with
3 Ms. Smith?

4 A. Yes. He is the reason that me and
5 Ms. Smith were actually able to connect and find each
6 other, because we knew about each other growing up,
7 but we never had actually spoken and talked until I
8 was 22 and we met up.

9 Q. Did you say that you met up with
10 Ms. Smith?

11 A. Yes.

12 Q. Did Mr. Harmon put the two of you in
13 contact with each other?

14 A. Yes.

15 Q. Do you know where she was living at the
16 time?

17 A. Yeah, she's in St. Louis, and still is
18 currently.

19 Q. Did you meet up together in Denver or in
20 St. Louis or somewhere else?

21 A. We've actually met up in -- we met up
22 briefly in Denver. We mostly met up in St. Louis when
23 I flew out there to meet my dad's side of the family.
24 And then after that then there was a period where we
25 also met again when we were in Salt Lake.

1 Q. When you flew out to meet your dad's side
2 of the family in St. Louis, was that when you were
3 around 22?

4 A. This was actually more of a -- I was more
5 28 -- 28 when that happened.

6 Q. How many times have you been back to
7 St. Louis?

8 A. I've only been there twice.

9 Q. And both times did you see your dad's
10 family?

11 A. One time I did. The other time was just
12 for a basketball, sporting, but I didn't have time to
13 meet up with them because I was coaching basketball at
14 the time.

15 Q. Prior to reconnecting with him at age 22,
16 did you have any communication with Mr. Harmon?

17 A. No. But -- excuse me -- prior to that
18 there was periods like I had mentioned earlier when I
19 was, like, five as a kid making phone calls with him
20 and talking with him on the phone. We would -- I know
21 he was in St. Louis, but that ended around beginning
22 parts of elementary I didn't hear from him.

23 Q. Aside from talking on the phone, how
24 would you communicate with him? Did the two of you
25 text? Did you write letters?

1 A. It was mostly through phone calls. We
2 would call to hear each other's voices and just to
3 talk. But we didn't -- I'm not much of a texter, so
4 it was good to just, you know, hear his voice.

5 Q. What was his address at the time of his
6 death?

7 A. That, I do not know.

8 Q. Do you know what his phone number was?

9 A. That, I do not know because there was a
10 period where we couldn't get ahold of him. And he was
11 deleting Facebook pages and making new ones. So I was
12 trying to track him down more so, but I -- I didn't
13 hear from him just because I didn't have his number.
14 But I was sending messages through Facebook.

15 Q. So he had a Facebook page; is that right?

16 A. I believe so, yes, he did.

17 Q. And you communicated with each other
18 through Facebook?

19 A. No. I tried to reach out to get ahold of
20 him through Facebook. Only times we really actually
21 had a communication was when I did have his cell phone
22 number.

23 Q. Do you know if Mr. Harmon experienced
24 periods of homelessness?

25 A. No.

1 Q. And just to clarify, that wasn't a great
2 question. Is that no you don't know, or no --

3 A. No, I don't know. I do not know. My
4 apologies.

5 Q. No, that was my poor question.

6 So defendants served some discovery
7 requests on your counsel several weeks ago, which your
8 counsel might have sent on to you, and your responses
9 aren't due yet.

10 But one of the requests asks you for
11 photos of Mr. Harmon that were in your possession at
12 the time of his death that were taken in the prior
13 five years. Is there any reason why you'll be unable
14 to access or provide those?

15 A. Can you re-explain, like, the meaning of
16 the photos, like...

17 Q. Sure. Sorry, that was a long and
18 confusing question.

19 A. Yeah, thank you.

20 Q. So one of the things we've asked you and
21 Ms. Smith for as part of this litigation is to provide
22 photos that you had of Mr. Harmon at the time of his
23 death.

24 Is there any reason why you won't be able
25 to provide those or don't have those anymore?

1 MR. LUTZ: Katie, I'm going to object on
2 the -- to the extent that this calls for --
3 unnecessarily encroaches on the work product privilege
4 and you'll have the answers which explain those
5 objections more fully.

6 Patrick, you can go ahead and answer.

7 THE WITNESS: No, I do not know.

8 Q. BY MS. NICHOLS: And the same question,
9 we asked for any correspondence you had with your
10 father in the five years prior to his death. That
11 includes letters, postcards, text messages, emails.

12 Is there any reason that you won't be
13 able to provide those materials? And I'm asking sort
14 of were they destroyed? Did you not keep those kind
15 of things?

16 A. Like I said, most of the communication
17 that we had was through verbal phone call. So unless
18 you were recording phone calls, I don't think there
19 would be a way to provide those type of information.

20 Q. Fair enough. Thanks.

21 How would you -- if you know, how would
22 you describe Mr. Harmon's physical health at the time
23 of his death?

24 MR. LUTZ: Lacks foundation.

25 THE WITNESS: That, I do not know.

1 Q. BY MS. NICHOLS: Do you know if he saw a
2 doctor regularly?

3 A. That, I do not know.

4 Q. Do you know if he'd ever been diagnosed
5 with any diseases, chronic illnesses, or conditions?

6 A. Only from what the family told me on his
7 side about him having mental health illness.

8 Q. Do you know what kind of mental health
9 illness?

10 A. I believe --

11 MR. LUTZ: Hold on. Object -- object to
12 foundation. Calls for expert testimony.

13 Go ahead.

14 THE WITNESS: I was going to say, that I
15 don't know exactly, so I couldn't give you direct.

16 Q. BY MS. NICHOLS: What did family tell you
17 or suggest to you that they believed his mental health
18 concerns to be?

19 MR. LUTZ: Object to form. Vague.

20 MS. NICHOLS: You can still answer.

21 THE WITNESS: That, I -- I don't know or
22 I can't tell.

23 Q. BY MS. NICHOLS: So all you heard from
24 family was that he had potential mental health --

25 A. Just obviously the things that played

1 into the role of him having a criminal background.

2 Q. Do you know if Mr. Harmon smoked tobacco?

3 A. I do not know.

4 Q. Do you know if he drank alcohol?

5 A. I do not know.

6 Q. Do you know if he used any prescription
7 drugs?

8 A. That, I do not know.

9 Q. Do you know if he used any illegal drugs?

10 A. That, I do not know.

11 Q. Do you know if he was ever treated for a
12 substance abuse or use disorder?

13 A. That, I don't know.

14 Q. How old was your father when he died?

15 A. I believe he was 50, just about to be 51.

16 Q. When was his birthday?

17 A. October 15th, I believe.

18 Q. And you mentioned yourself and Ms. Smith.

19 Did Mr. Harmon have any other biological children?

20 A. No.

21 Q. Do you know if he had any adopted
22 children?

23 A. No.

24 Q. Did Mr. Harmon have any dependents at the
25 time of his death?

1 A. I don't know.

2 MR. LUTZ: Foundation.

3 Q. BY MS. NICHOLS: Sorry, Mr. Harmon, what
4 was your answer?

5 A. That, I don't know.

6 Q. Do you know if he was supporting anyone
7 financially at the time of his death?

8 A. Besides moments of my sister saying he
9 helped her out with bills or sent her money to pay
10 bills, no, I do not.

11 Q. Did he ever help you out with bills or
12 provide financial support?

13 A. No, I didn't need it at the time.

14 Q. Do you know, did Mr. Harmon have a trust
15 or will or any similar legal instrument at the time of
16 his death?

17 A. That, I don't know.

18 Q. You're the representative of his estate;
19 is that correct?

20 A. Correct.

21 Q. Were you appointed to be representative?

22 A. It was going to be joint. My sister felt
23 confident with me taking the lead.

24 Q. Were you appointed by a court?

25 A. No.

1 Q. Did anyone else seek to be representative
2 of the estate?

3 MR. LUTZ: Objection. Foundation and
4 calls for a legal conclusion.

5 THE WITNESS: No.

6 Q. BY MS. NICHOLS: Who are the
7 beneficiaries of the estate?

8 A. Myself --

9 MR. LUTZ: Objection. Calls for a legal
10 conclusion.

11 MS. NICHOLS: Sorry, you can go ahead.

12 THE WITNESS: Okay. Just my sister I
13 know.

14 Q. BY MS. NICHOLS: Sorry, did you say your
15 sister and yourself?

16 A. Beneficiaries of my father?

17 Q. Of your father's estate.

18 A. Correct, yes.

19 Q. What assets did Mr. Harmon have at the
20 time of his death?

21 A. That, I don't know.

22 MR. LUTZ: Objection.

23 Q. BY MS. NICHOLS: In the years prior to
24 his death, how much income did Mr. Harmon earn?

25 MR. LUTZ: Objection. Foundation.

1 THE WITNESS: That, I don't know.

2 Q. BY MS. NICHOLS: Did he file tax returns?

3 MR. LUTZ: Objection. Foundation.

4 THE WITNESS: That, I don't know.

5 Q. BY MS. NICHOLS: How much of his income
6 did Mr. Harmon spend on himself at the time of his
7 death?

8 MR. LUTZ: Objection. Foundation.

9 THE WITNESS: That, I don't know.

10 Q. BY MS. NICHOLS: Is it a -- so there --
11 let me start that again.

12 No assets from the estate have been
13 distributed to anyone; is that right?

14 A. No.

15 Q. Okay. What types of damages are you
16 seeking in this litigation?

17 MR. LUTZ: Objection. Calls for a legal
18 conclusion and analysis.

19 THE WITNESS: Nick, how do I answer that?

20 MR. LUTZ: I can't tell you, but you can
21 go ahead and answer.

22 Q. BY MS. NICHOLS: I guess you're seeking
23 money from defendants; is that correct?

24 A. Correct, from my understanding that --
25 correct.

1 Q. And are you seeking damages for loss of
2 companionship, loss of consortium, similar damages to
3 those?

4 A. There's a lot of loss, obviously, for
5 life. But then there's also the emotional wear, the
6 emotional strain. The physical toll that it's taken.
7 Mentally, financially in this process. So, yeah,
8 there's a lot of damages that's been -- there's -- I
9 don't know how to explain this, but, yeah, there's a
10 lot of damages.

11 Q. Are you seeking a specific dollar amount
12 for those damages you just described?

13 A. I don't know how you put the value of my
14 father's life in a dollar amount, so I can't give you
15 that answer.

16 Q. Are you intending to ask the jury for a
17 specific dollar amount for those damages you just
18 described?

19 MR. LUTZ: Objection. This encroaches on
20 the work product privilege and attorney-client
21 privilege.

22 THE WITNESS: Again, I can't put a value
23 on my father's life. Can't put a dollar sign on that.

24 Q. BY MS. NICHOLS: Are you seeking money
25 damages for a loss of financial support from

1 Mr. Harmon?

2 A. For a loss of financial support?

3 Q. Yeah.

4 A. No.

5 Q. What about money damages for a loss or
6 reduction of inheritance?

7 MR. LUTZ: Objection. Calls for a legal
8 conclusion. There's a foundation problem.

9 THE WITNESS: Yeah, there's no way to
10 tell that. There's no way to tell what could have
11 happened in the future had he still been here. So I
12 can't give you a direct answer of that.

13 Q. BY MS. NICHOLS: I -- I understand and I
14 know these are kind of the kinds of questions that,
15 you know, lawyers will -- will fight about. But, you
16 know, they're also -- I'm trying to understand what --
17 what it is that you're seeking from defendants at this
18 point. And so the -- you know, the best answers that
19 you have are helpful and important for us.

20 A. I'm -- so then, I mean, permission to
21 speak in this moment.

22 There -- there's a lot that's happened
23 from that loss of my father and the things that we'll
24 no longer have, whether it's him missing birthdays of
25 his granddaughters, because he has multiple

1 granddaughters. He's going to miss graduations. He's
2 going to miss weddings. He's going to miss
3 celebrations of life no matter -- no matter what it
4 is, those are things he's going to miss as well as the
5 knowledge he gave me, the things that he helped me
6 direct to not do, learned from his mistakes instead of
7 making my own.

8 The foundation of having a hole, those
9 things are gone. So, yeah, there's a lot of emotional
10 damage. And then there's also the wear on me that's
11 also made me shut down where I've had to go to
12 therapy, where I've had to seek counseling, had to go
13 see a psychiatrist for me to understand because of me
14 shouldering so much of this responsibility for my
15 father's estate.

16 At the same time, being a father my own
17 because that simultaneously happened when my father
18 was killed. Because two weeks after -- two, three
19 weeks after my father was killed, I got an ultrasound
20 and found out I was going to be a father.

21 So that simultaneous -- that is the
22 reason why I'm in Virginia in the first place where
23 I've had to pretty much uproot my life from being in
24 Denver, because I wanted to make sure that my
25 daughter's life -- her mother's from here -- even

1 though we met in Denver.

2 And this all happened simultaneously. It
3 was the best thing for her to be back with her family
4 while I took on these new lawyers, lawyers, flying out
5 and back and forth meeting.

6 So she moved back home. I then, for two
7 years, in the middle of this process flew back and
8 forth, looked at my savings, my -- what I had, said
9 for -- for me to try and do something with my life to
10 helping deal with the court case as well as flying
11 back and forth between Denver and DC.

12 Then finally after two years I was able
13 to move out to be in Virginia to be with my daughter.
14 And then obviously the emotional wear and tear of me
15 dealing with everything, I shut down, which then
16 caused me to not be an effective partner, which then
17 caused things to really blow up. And then COVID
18 happened.

19 So there's a lot of domino effects. And
20 that's just for me. I can't even speak for my sister.
21 But those are a lot of domino effects as taking a toll
22 on me, and that's changed my whole life to where,
23 like, I'm -- I'm now dealing with this and it's going
24 on year -- over year five.

25 Q. That's helpful. Thank you very much.

1 A. Yes.

2 Q. Are you seeking punitive damages in this
3 case?

4 MR. LUTZ: Objection. Calls for a legal
5 conclusion.

6 THE WITNESS: That, I can't answer.

7 Q. BY MS. NICHOLS: Mr. Harmon, have you
8 watched any of the body cam videos from the officers
9 of this incident?

10 A. Yes.

11 Q. Do you know which videos you watched?

12 A. I've seen all three.

13 Q. When did you first watch them?

14 A. This was all around the same time I was
15 dealing with my lawyers and counsel and got to see all
16 of the body cam footage. So this was still all around
17 the first couple months of after it happened. But I
18 haven't wanted to or needed to go back and re-watch.

19 Q. How many times would you say you've
20 watched the videos?

21 A. In the first couple months I've watched
22 them -- I can't give you a number, but it was a good
23 amount of times. Or I had -- because there was the
24 anger aspect, the hurt, and then there's the logical
25 from me to try and see what I can make sense of it

1 myself. So, yeah, there's a few times I've watched
2 it.

3 Q. You're aware that Officer Fox says he saw
4 a knife in Mr. Harmon's hand, right?

5 A. Correct.

6 Q. And you're aware that a knife can be seen
7 next to Mr. Harmon's hand after he falls to the
8 ground, correct?

9 A. That, I can't be conclusive on.

10 Q. Are you aware that investigators
11 recovered a knife from that location after Mr. Harmon
12 was taken to the hospital?

13 A. From what I --

14 MR. LUTZ: Objection. Foundation.

15 Q. BY MS. NICHOLS: I'm sorry, what was
16 that?

17 A. I said just from what I was told.

18 Q. Is it your position that Mr. Harmon did
19 not have a knife in his hand when Mr. -- when Officer
20 Fox fired his weapon?

21 A. That, I couldn't see or tell you.

22 Q. All right. Do you have any position on
23 where the knife came from?

24 A. That, I --

25 MR. LUTZ: Objection. Speculation.

1 THE WITNESS: -- could not tell you.

2 MR. LUTZ: Calls for speculation.

3 Q. BY MS. NICHOLS: Do you believe one of
4 the officers planted the knife on the ground?

5 A. That, I can't tell you.

6 Q. Was Mr. Harmon right-handed or
7 left-handed?

8 MR. LUTZ: Objection. Foundation.

9 THE WITNESS: That, I can't be too
10 conclusive on. I can only go off what I've heard. I
11 can't be for sure.

12 Q. BY MS. NICHOLS: What have you heard?

13 A. He was left.

14 Q. Who did you hear that from?

15 A. Family.

16 Q. Do you believe that Officer Fox should
17 not have fired his weapon when he did?

18 A. Yes, I believe he shouldn't have.

19 Q. Sorry, what was -- what was the last
20 thing you said?

21 A. Do I believe he should have fired his
22 weapon when he should have, and I said no, I don't
23 believe he should have.

24 Q. What do you believe he should have done?

25 MR. LUTZ: Objection. Calls for a legal

1 conclusion. Calls for speculation.

2 THE WITNESS: Not used deadly force.

3 Q. BY MS. NICHOLS: And do you mean he
4 should have used a different type of force?

5 MR. LUTZ: Objection. Calls for a legal
6 conclusion. Calls for speculation.

7 THE WITNESS: That, I can't be conclusive
8 on. That, I can't tell you. I just don't think
9 lethal force.

10 Q. BY MS. NICHOLS: Did you give any
11 interviews or statements regarding the incident over
12 Mr. Harmon's death?

13 A. Can you explain that? Did I give any
14 statements to?

15 Q. Sorry, that wasn't a very good question.
16 Were you ever interviewed for a -- in a
17 news article or did you give any sort of interview or
18 public statement about the incident?

19 A. Me personally, no, nor did my sister.

20 Q. Did other members of your family?

21 A. Yes.

22 Q. I think you mentioned you have a Facebook
23 account; is that correct?

24 A. Correct.

25 Q. How long have you had that account?

1 A. Since high school. I would say since,
2 like, 20- -- 2006.

3 Q. Do you have more than one account?

4 A. No.

5 Q. Do you have other -- any other social
6 media accounts?

7 A. Just Instagram, but I don't do much
8 social media.

9 Q. Do you have a Twitter account?

10 A. Yes, but I haven't touched it in years.

11 Q. Do you know what the Twitter handle is?

12 A. I guess just, like, Startastic or
13 something, but it's nothing bizarre.

14 Q. Is it Startastic 5?

15 A. Yes.

16 Q. Have you ever posted on social media
17 about the incident?

18 A. Yes.

19 Q. Do you know -- excuse me -- do you know
20 on which platform you posted about the incident?

21 A. Mainly on Facebook. I've posted maybe a
22 picture of memorial to my father from memorials I've
23 seen done of him on just my Instagram, and then a
24 GoFundMe to help through this process, but besides
25 that, no.

1 Q. What about your father generally? Have
2 you ever posted about your father on any of those
3 social media platforms, beyond what you just said?

4 A. Yes. My father, yes, Facebook.

5 MS. NICHOLS: Okay. I -- I might be
6 pretty close to done. Can we take just a three-minute
7 break so I can double-check my notes?

8 MR. LUTZ: Yeah. Would it be okay to
9 take -- we'll just take ten -- ten real quick, just do
10 a coffee break.

11 MS. NICHOLS: Sure, that's great.

12 MR. LUTZ: Okay.

13 MS. NICHOLS: Thank you.

14 (There was a break taken.)

15 MS. NICHOLS: Let's go back on the
16 record.

17 Mr. Harmon, I don't have any more
18 questions for you on direct.

19 Mr. Lutz, turn it over to you.

20 MR. LUTZ: I do not have anything
21 additional for my client.

22 MS. NICHOLS: Great.

23 Mr. Harmon, thank you so much for your
24 time. I realize this is unpleasant, but I appreciate
25 it.

1 THE REPORTER: Read and sign?

2 MR. LUTZ: Yes, please.

3 THE REPORTER: And you need a copy of the
4 transcript?

5 MR. LUTZ: Electronic only with
6 exhibits -- I guess we're not -- electronic only.

7 MS. NICHOLS: Same for defendants, just
8 electronic, please.

9 (The deposition was concluded at 9:52 a.m.)

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1 Case: Harmon v. Salt Lake City, et al.
 Case No.: 2:19-cv-00553-HCN-CMR
 2 Date: November 8, 2022
 Reporter: Vickie Larsen, CSR/RMR
 3

4 WITNESS CERTIFICATE

State of Utah)
 5 ss.
 County of Salt Lake)
 6

I, PATRICK HARMON, II, HEREBY
 7 DECLARE: That I am the witness referred to in the
 foregoing testimony; that I have read the transcript
 8 and know the contents thereof; that with these
 corrections I have noted this transcript truly and
 9 accurately reflects my testimony.

PAGE-LINE	CHANGE/CORRECTION	REASON
10		
11		
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19		

20 _____ No corrections were made.

21
 22 _____
 PATRICK HARMON, II

23 SUBSCRIBED and SWORN to before me on this _____ day of
 24 _____, 2022, by PATRICK HARMON, II.

25 _____
 Notary Public

Reporter's Certificate

State of Utah)
County of Salt Lake)

I, Vickie Larsen, Certified Court Reporter
and Registered Merit Reporter in the State of Utah, do
hereby certify:

THAT the foregoing proceedings were taken
before me at the time and place set forth herein; that
the witness was duly sworn to tell the truth, the whole
truth, and nothing but the truth; and that the
proceedings were taken down by me in shorthand and
thereafter transcribed into typewriting under my
direction and supervision;

THAT the foregoing pages contain a true
and correct transcription of my said shorthand notes so
taken.

IN WITNESS WHEREOF, I have subscribed my
name this 14th day of November, 2022.



Vickie Larsen, CCR/RMR
Utah License No. 109887-7801
Nevada License No. 966

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